



0000112656

MIAMI
NEW YORK
WASHINGTON, D.C.

EUROPE
BRUSSELS
BUDAPEST
HELSINKI
ISTANBUL
LONDON
MOSCOW
PARIS
PRAGUE
STOCKHOLM
WARSAW

AFRICA
JOHANNESBURG

WHITE & CASE
LIMITED LIABILITY PARTNERSHIP
55 AVENUE OF THE AMERICAS
NEW YORK, NEW YORK 10016-2787
TELEPHONE: (1-212) 819-8200
FACSIMILE: (1-212) 354-8113

DIRECT DIAL: (213) 620-7713

ORIGINAL
RECEIVED

1999 JUL -7 A 11:05

AZ CORP COMMISSION
DOCUMENT CONTROL

ASIA
ALMATY
ANKARA
BANGKOK
BOMBAY
HANOI
HO CHI MINH CITY
HONG KONG
JAKARTA
SINGAPORE
TOKYO

MIDDLE EAST
JEDDAH
RIYADH

LATIN AMERICA
MEXICO CITY
SAO PAULO

Arizona Corporation Commission
DOCKETED

JUL 7 1999

DOCKETED BY

July 2, 1999

Arizona Corporation Commission
Docket Control Center
1200 West Washington Street
Phoenix, Arizona 85007-2992

Dear Docket Office:

Enclosed please find an original and ten copies of a Motion for Intervention, Applications for Admission Pro Hac Vice and Consents to Designation for Margaret A. Rostker, Esq. And Jerry R. Bloom, Esq., as counsel and on behalf of DFO Partnership in Docket No. E-01933A-98-0471, E-01933A-97-0772. This filing has this day been served upon all parties on the service list for Docket No. RE-00000C-94-0165. Copies of the foregoing have also been served upon Jerry Rudibaugh,, Chief Hearing Officer, Paul Bullis, Chief Counsel and Ray Williamson, Acting Director, Utilities Division.

Sincerely,

Margaret A. Rostker

Enclosures

ORIGINAL
RECEIVED

BEFORE THE ARIZONA CORPORATION COMMISSION

1999 JUL -7 A 11: 05

CARL J. KUNASEK
Chairman

JIM IRVIN
Commissioner

WILLIAM A. MUNDELL
Commissioner

INTERVENTION

AZ CORP COMMISSION
DOCUMENT CONTROL

IN THE MATTER OF THE APPLICATION OF)	DOCKET NO. E-01933A-98-0471
TUCSON ELECTRIC POWER COMPANY FOR)	
APPROVAL OF ITS STRANDED COST)	DFO PARTNERSHIP
RECOVERY AND FOR RELATED APPROVALS,))	MOTION TO INTERVENE
AUTHORIZATIONS AND WAIVERS)	
_____)	

IN THE MATTER OF THE FILING OF TUCSON)	DOCKET NO. E-01933A- 97 -0772
ELECTRIC POWER COMPANY OF)	
UNBUNDLED TARIFFS PURSUANT TO A.A.C.)	DFO PARTNERSHIP
R14-2-1061 <u>ET. SEQ.</u>)	MOTION TO INTERVENE
_____)	

DFO Partnership ("DFO"), through undersigned counsel, and pursuant to Arizona Administrative Code Rule 14-3-105, hereby submits its Motion to Intervene in the matters captioned above. In support hereof, DFO states as follows:

1. DFO is a New York general partnership with financial interests in electricity markets. DFO is the beneficial owner of a generation plant, Irvington Unit 4 ("Irvington Plant"), located in Tucson, Arizona. DFO leases the Irvington Plant to Tucson Electric Power Company.
2. DFO will be directly and substantially affected by the outcome of this proceeding because the Arizona Corporation Commission ("Commission") will determine herein issues relating to comprehensive restructuring of the electric generation and service marketplace. DFO is interested in the Arizona marketplace and in the Commission deliberations and decisions that will directly impact DFO's Irvington Plant in terms of generation sales, the lease with Tucson Electric Power Company, and the market value of the Irvington Plant. To this end, it is important the DFO receive notice of all pleadings, hearings and orders. Also, due to DFO's position as an owner of a generation facility within Arizona, DFO can provide an important stakeholder perspective into the deregulation process.
3. DFO's intervention herein will not unduly broaden the issues to be addressed in this proceeding.

4. DFO previously has been granted permission by the Commission to intervene in Docket No. RE-00000C-94-0165, "In the Matter of Competition in the Provision of Electric Services Throughout the State of Arizona".

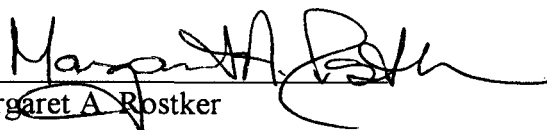
5. All correspondence and communications in regard to DFO's participation in these matters should be addressed to the following:

Margaret A. Rostker, Esq.
Jerry R. Bloom, Esq.
WHITE & CASE LLP
633 West Fifth Street
Los Angeles, Ca. 90071
TEL: (213) 620-7713
FAX: (213) 687-0758
E-Mail: rostkma@la.whitecase.com

WHEREFORE, for the foregoing reasons, DFO Partnership respectfully requests that the Commission grant this motion to intervene.

RESPECTFULLY SUBMITTED this 2 day of July, 1999.

WHITE & CASE LLP

By: 
Margaret A. Rostker

Jerry R. Bloom
Margaret A. Rostker

WHITE & CASE LLP
633 West Fifth Street
Los Angeles, Ca. 90071

Attorneys for DFO Partnership

IN THE MATTER OF THE APPLICATION OF) Docket No. E-01933A-98-0471
TUCSON ELECTRIC POWER COMPANY FOR)
APPROVAL OF ITS STRANDED COST)
RECOVERY AND FOR RELATED APPROVALS,)
AUTHORIZATIONS AND WAIVERS)
_____)

IN THE MATTER OF THE FILING OF TUCSON) Docket No. E-01933A-97-0772
ELECTRIC POWER COMPANY OF)
UNBUNDLED TARIFFS PURSUANT TO A.C.C.)
R14-2-1061 ET.SEQ.)
_____)

APPLICATION FOR ADMISSION

PRO HAC VICE

Pursuant to Rule 33(d) of the Rules of the Supreme Court, I, MARGARET A. ROSTKER, ATTORNEY AT LAW, practicing at the law firm of WHITE & CASE LLP, do hereby apply to the Arizona Corporation Commission ("Commission") for admission to practice pro hac vice in the above-entitled matter.

In support of this application, I submit the following information required by Rule 33(d):

(i) My office address and telephone number are:

WHITE & CASE LLP
633 West Fifth Street
Los Angeles, CA 90071
TEL: (213) 620 - 7713
FAX: (213) 687 - 0758

(ii) The courts to which I have been admitted to practice law and the dates of admission are as follows:

California December 1996

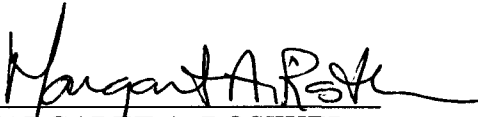
(iii) I am an attorney in good standing and currently eligible to practice in each of the courts enumerated in paragraph (ii).

(iv) Within the preceding two years, and specifically on April 8, 1999, I did request to appear as counsel pro hac vice in this state in Docket No. U-0000-94-165, and said request was granted by the Commission on April 21, 1999.

(v) I am not currently suspended or disbarred in any court.

The designated member of the State Bar of Arizona with whom the Commission and counsel may readily communicate is:

Leonardo Loo
Attorney At Law
O'Connor, Cavanagh, Anderson,
Killingsworth & Beshears, P.A.
One East Camelback Road, Suite 1100
Phoenix, Arizona 85012-1656
TEL: (602) 263 - 2748
FAX: (602) 263 - 2900


MARGARET A. ROSTKER
ATTORNEY AT LAW
WHITE & CASE LLP
633 West Fifth Street
Los Angeles, CA 90071

IN THE MATTER OF THE APPLICATION OF) Docket No. E-01933A-98-0471
TUCSON ELECTRIC POWER COMPANY FOR)
APPROVAL OF ITS STRANDED COST)
RECOVERY AND FOR RELATED APPROVALS,)
AUTHORIZATIONS AND WAIVERS)
_____)

IN THE MATTER OF THE FILING OF TUCSON) Docket No. E-01933A-97-0772
ELECTRIC POWER COMPANY OF)
UNBUNDLED TARIFFS PURSUANT TO A.C.C.)
R14-2-1061 ET. SEQ.)
_____)

APPLICATION FOR ADMISSION

PRO HAC VICE

Pursuant to Rule 33(d) of the Rules of the Supreme Court, I, JERRY R. BLOOM, ATTORNEY AT LAW, practicing at the law firm of WHITE & CASE LLP, do hereby apply to the Arizona Corporation Commission ("Commission") for admission to practice pro hac vice in the above-entitled matter.

In support of this application, I submit the following information required by Rule 33(d):

(i) My office address and telephone number are:

WHITE & CASE LLP
633 West Fifth Street
Los Angeles, CA 90071
TEL: (213) 620 - 7707
FAX: (213) 687 - 0758

(ii) The courts to which I have been admitted to practice law and the dates of admission are as follows:

Washington D.C.	1981
Florida	1981
New York	1984
California	1988

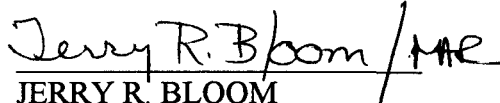
(iii) I am an attorney in good standing and currently eligible to practice in each of the courts enumerated in paragraph (ii).

(iv) Within the preceding two years, and specifically on April 8, 1999, I did request to appear as counsel pro hac vice in this state in Docket No. U-0000-94-165, and said request was granted by the Commission on April 21, 1999.

(v) I am not currently suspended or disbarred in any court.

The designated member of the State Bar of Arizona with whom the Commission and counsel may readily communicate is:

Leonardo Loo
Attorney At Law
O'Connor, Cavanagh, Anderson,
Killingsworth & Beshears, P.A.
One East Camelback Road, Suite 1100
Phoenix, Arizona 85012-1656
TEL: (602) 263 - 2748
FAX: (602) 263 - 2900


JERRY R. BLOOM
ATTORNEY AT LAW
WHITE & CASE LLP
633 West Fifth Street
Los Angeles, CA 90071

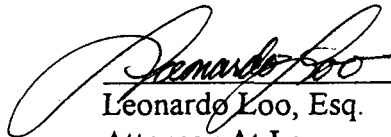
BEFORE THE ARIZONA CORPORATION COMMISSION

IN THE MATTER OF THE APPLICATION OF) Docket No. E-01933A-98-0471
TUCSON ELECTRIC POWER COMPANY FOR)
APPROVAL OF ITS STRANDED COST)
RECOVERY AND FOR RELATED APPROVALS,)
AUTHORIZATIONS AND WAIVERS)
_____)

IN THE MATTER OF THE FILING OF TUCSON) Docket No. E-01933A-~~97~~-0772
ELECTRIC POWER COMPANY OF)
UNBUNDLED TARIFFS PURSUANT TO A.C.C.)
R14-2-1061 ET.SEO.)
_____)

CONSENT TO DESIGNATION

Pursuant to Rule 33(d) of the Rules of the Supreme Court, I, Leonardo Loo, do consent to be the designated member of the State Bar of Arizona on behalf of Margaret A. Rostker, Attorney At Law, of White & Case LLP, for purposes of her Application for Admission, Pro Hac Vice in the above-captioned matters.



Leonardo Loo, Esq.

Attorney At Law

O'Connor, Cavanagh, Anderson,

Killingsworth & Beshears, P.A.

One East Camelback Road, Suite 1100

Phoenix, Arizona 85012-1656

TEL: (602) 263 - 2748

FAX: (602) 263 - 2900

Ten copies of the
foregoing filed this July 2 1999
with:

Docket Control Division
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007

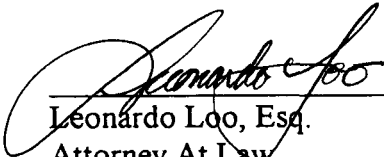
BEFORE THE ARIZONA CORPORATION COMMISSION

IN THE MATTER OF THE APPLICATION OF) Docket No. E-01933A-98-0471
TUCSON ELECTRIC POWER COMPANY FOR)
APPROVAL OF ITS STRANDED COST)
RECOVERY AND FOR RELATED APPROVALS,)
AUTHORIZATIONS AND WAIVERS)
_____)

IN THE MATTER OF THE FILING OF TUCSON) Docket No. E-01933A-97-0772
ELECTRIC POWER COMPANY OF)
UNBUNDLED TARIFFS PURSUANT TO A.C.C.)
R14-2-1061 ET. SEQ.)
_____)

CONSENT TO DESIGNATION

Pursuant to Rule 33(d) of the Rules of the Supreme Court, I, Leonardo Loo, do consent to be the designated member of the State Bar of Arizona on behalf of Jerry R. Bloom, Attorney At Law, of White & Case LLP, for purposes of his Application for Admission, Pro Hac Vice in the above-captioned matters.



Leonardo Loo, Esq.
Attorney At Law

O'Connor, Cavanagh, Anderson,
Killingsworth & Beshears, P.A.
One East Camelback Road, Suite 1100
Phoenix, Arizona 85012-1656
TEL: (602) 263 - 2748
FAX: (602) 263 - 2900

Ten copies of the
foregoing filed this July 2 1999
with:

Docket Control Division
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007

Copies of the foregoing mailed
or hand delivered this July 2, 1999
to:

Ms. Barbara Klemstine
Law Department
Station 9909
P. O. Box 53999
Phoenix, AZ 85072-3999

Mr. Sam De Fraw
Rate Intervention Division
Naval Facilities Engineering Command
200 Stovall Street, Room 10S12
Alexandria, VA 22332-2300

Mr. Greg Patterson
RUCO
2828 N. Central Ave.
Suite 1200
Phoenix, AZ 85004

Mr. Rick Lavis
Arizona Cotton Growers Association
4139 East Broadway Road
Phoenix, AZ 85040

Mr. Michael A. Curtis
Mr. Paul Michaud
Attorneys for Arizona Municipal Power Users'
Association
Mohave Electric Cooperative, Inc. & Navopache
Electric Cooperative, Inc.
Martinez & Curtis, P.C.
2712 North 7th Street
Phoenix, AZ 85006

Mr. Steve Brittle
Don't Waste Arizona, Inc.
6205 South 12th Street,
Phoenix, AZ 95040

Mr. Walter W. Meek
President
Arizona Utility Investors Association
2100 N. Central Avenue, Suite 210
Phoenix, AZ 85004

Ms. Karen Glennon
19037 N. 44th Avenue
Glendale, Arizona 85308

Mr. Rick Gilliam
Land And Water Fund Of The Rockies
2260 Baseline Road, Suite 200
Boulder, CO 80302

Columbus Electric Cooperative, Inc.
P. O. Box 631
Deming, NM 88031

Mr. Charles R. Higgins
Arizona State AFL-CIO
5818 N. 7th Street, Suite 200
Phoenix, AZ 85014-5811

Continental Divide Electric Cooperati
P. O. Box 1087
Grants, NM 87020

Mr. Norman J. Furuta
Department of the Navy
900 Commodore Drive,
Building 107
San Bruno, CA 94066-5006

Dixie Escalante Rural Electric Associa
CR Box 95
Beryl, UT 84714

Ms. Barbara S. Bush
Coalition For Responsible Energy Education
315 West Rivera Drive
Tempe, AZ 85252

Garkane Power Association, Inc.
P. O. Box 790
Richfield, UT 84701

Arizona Dept. of Commerce Energy Office
3800 North Central Avenue, 12th Floor
Phoenix, AZ 85012

Ms. Betty Pruitt
Arizona Community Action Assoc.
2627 N. 3rd Street, Suite 2
Phoenix, AZ 85004

Mr. Bradley Carroll
Tucson Electric Power Co.
Legal Dept. - DB202
P. O. Box 711
Tucson, AZ 85702-0711

Ms. Clara Peterson
AARP
HC 31, Box 977
Happy Jack, AZ 86024

Mr. A.B. Baardson
Nordic Power
4281 N. Summerset
Tucson, AZ 85715

Ms. Barbara Sherman
Utility Watchdog Committee
120 E. McKellips Road
Tempe, AZ 85281-1118

Ms. Jessica Youle
PAB300
Salt River Project
P. O. Box 52025
Phoenix, AZ 85072-2025

Mr. Larry McGraw
USDA-RUS
6266 Weeping Willow
Rio Ranch, NM 87124

Mr. Joe Eichelberger
Magma Copper Company
P. O. Box 37
Superior, AZ 85273

Mr. Jim Driscoll
Arizona Citizen Action
2430 S. Mill, Suite 237
Tempe, AZ 85282

Mr. Craig Marks
Citizens Utilities Company
2901 N. Central Avenue
Suite 1660
Phoenix, AZ 85012-2736

Mr. William Balker
Electrical District No. 6
P. O. Box 16450
Phoenix, AZ 85011

Mr. Barry Huddleston
Diestec Energy
P. O. Box 4411
Houston, TX 77210-4411

Mr. John Jay List
General Counsel
National Rural Utilities Cooperative Fi
2201 Cooperative Way
Herndon, VA 21071

Mr. Steve Montgomery
Johnson Controls
2032 West 4th Street
Tempe, AZ 85281

Mr. Wallace Tillman
Chief Counsel
National Rural Electric Cooperative A
4301 Wilson Blvd.
Arlington, VA 22203-1860

Mr. Terry Ross
Center For Energy And Economic Development
P. O. Box 288
Franktown, CO 80116-0288

Mr. Robert Julian
PPG
1500 Merrell Lane
Belgrade, Montana 59714

Ms. Kimberly Knox
Streich Lang
2 North Central Avenue
Phoenix, AZ 85004

Mr. C. Webb Crockett
Attorneys for Asarco, Inc., Cyprus Cli
Co., Enron, Inc. and AAEC
Fennemore Craig
3003 N. Central Avenue, Suite 2600
Phoenix, AZ 85012-2913

Ms. Sheryl Johnson
Texas-New Mexico Power Co.
4100 International Plaza
Forth Worth, TX 76109

Mr. Lex Smith
Michael Patten
Attorneys for Morenci Water & Electr
Improvement Illinova Energy Partners
Energy Trading & Phelps Dodge Corp
Brown & Bain PC
2901 N. Central Avenue
Phoenix, AZ 85001-0400

Mr. Robert S. Lynch
Attorneys for Arizona Transmission Dependent
Utility Group
340 E. Palm Lane
Suite 140
Phoenix, AZ 85004-4529

Mr. Vinnie Hunt
City of Tucson
Department of Operations
4004 S. Park Avenue
Building #2
Tucson, AZ 85714

Mr. Michael Block
Goldwater Institute
201 North Central
Concourse Level
Phoenix, AZ 85073

Mr. Steve Wheeler
Attorneys for APS
Snell & Wilmer
One Arizona Center
400 E. Van Buren Street
Phoenix, AZ 85004-0001

Mr. Stan Barnes
Copper State Consulting Group
100 W. Washington Street
Suite 1415
Phoenix, AZ 85003

Ms. Elizabeth S. Firkins
International Brotherhood of Electrical
L.U. #1116
750 S. Tucson Blvd.
Tucson, AZ 85716-5698

Mr. Carl Robert Aron
Executive Vice President and COO
Itron Inc.
2818 N. Sullivan Road
Spokane, Washington 99216

Mr. Carl Dabelstein
2211 E. Edna Avenue
Phoenix, AZ 85022

Mr. Douglas Nelson
Attorney for Calpine Power Services
Douglas C. Nelson PC
7000 N. 16th Street
Suite 120-307
Phoenix, AZ 85020-5547

Mr. Roderick G. McDougall
City Attorney
200 W. Washington Street,
Suite 1300
Phoenix, AZ 85003-1611

Mr. Lawrence V. Robertson, Jr.
Attorney for PG&E Energy Services Corp.
Munger Chadwick PLC
333 North Wilmot
Suite 300
Tucson, AZ 85711-2634

Mr. Russell E. Jones
Attorneys for Trico Electric Cooperati
O'Connor, Cavangh Molly Jones
33 N. Stone Ave.
Suite 2100
P. O. Box 2268
Tucson, AZ 85702

Mr. Albert Sterman
Arizona Consumers Council
2849 East 8th Street
Tucson, AZ 85716

Mr. Christopher Hitchcock
Attorneys for Sulphur Springs Valley
Cooperative, Inc.
Hitchcock Hicks & Conlogue
P. O. Box 87
Bisbee, AZ 85603-0087

Mr. Michael Grant
Attorneys for AEPCO, Graham County Electric
Cooperative and
Duncan Valley Electric Cooperative
Gallagher & Kennedy
2600 N. Central Avenue
Phoenix, AZ 85004

Mr. Raymond S. Heyman
Ms. Darlene M. Wauro
Attorneys for New Energy Ventures,
Roshka Heyman & Dewulf, PLC
Two Arizona Center
400 North 5th Street, Suite 1000
Phoenix, Arizona 85004

Ms. Suzanne Dallimore
Antitrust Unit Chief
Department of Law Building
Attorney General's Office
1275 West Washington Street
Phoenix, AZ 85007

Ms. Billie Dean
AVIDD
P.O. Box 97
Marana, AZ 85652-0987

Mr. Myron L. Scott
Attorneys for Arizona for a Better Environment
1628 E. Southern Ave., No. 9-328
Tempe, AZ 85282-2179

Mr. Andrew Bettwy
Ms. Debra Jacobson
Southwest Gas Corporation
5241 Spring Mountain Road
Las Vegas, NV 89102

Ms. Barbara R. Goldberg
Office of the City Attorney
3939 Civic Center Blvd.
Scottsdale, AZ 851251

Mr. Chris King
Vice President
CellNet Data Systems, Inc.
12667 Alcosta Blvd., Suite #350
San Ramon, CA 94583

Mr. Peter Glaser
Doherty Rumble & Butler PA
1401 New York Ave., N.W., Suite 1100
Washington, DC 20005

Mr. Raymond B. Wuslich
Winston & Strawn
1400 L Street, NW
Washington, DC 20005

Mr. Bradford A. Borman
PacifiCorp
201 S. Main, Suite 2000
Salt Lake City, UT 84140

Mr. Steven C. Gross
Porter Simon
40200 Truckee Airport Road
Truckee, CA 96161

Mr. Timothy M. Hogan
Arizona Center for Law in the Public Interest
202 E. McDowell Rd., Suite 153
Phoenix, AZ 85004

Mr. Donald R. Allen
Mr. John P. Coyle
Duncan & Allen
1575 Eye Street, N.W., Suite 300
Washington, DC 20005

Ms. Marcia Weeks
18970 N. 116th Lane
Surprise, AZ 85374

Mr. Ward Camp
Thaser Advance Metering Services
Alvarado Square
Mail Stop SIM9
Albuquerque, NM 87158

Mr. John T. Travers
Mr. William H. Nau
272 Market Square, Suite 2724
Lake Forest, IL 60045

Mr. Thane T. Twiggs
Idaho Power Company
P.O. Box 70
Boise, ID 83707

Mr. Timothy Michael Toy
Winthrop, Stimson, Putnam & Roberts
One Battery Park Plaza
New York, NY 10004-1490

Ms. Libby Brydolf
California Energy Markets Newsletter
2419 Bancroft Street
San Diego, CA 92104

Ms. Stephanie A. Conaghan
Duane, Morris & Heckscher LLP
1667 K Street N.W., Suite 700
Washington, DC 20006-1608

Mr. Paul W. Taylor
R.W. Beck
2201 E. Camelback Rd., Suite 115-B
Phoenix, AZ 85016-3433

Mr. James P. Barlett
Attorney for Arizona Power Authority
533 N. 7th Street, Suite B-215
Phoenix, AZ 85014

Mr. Jay I. Moyes
Meyer Hendricks Bivens & Moyes PA
3003 N. Central Ave., Suite 1200
P.O. Box 2199
Phoenix, AZ 85001-2199

Mr. Stephen L. Teichler
Duane Morris & Heckscher LLP
1667 K Street NW, Suite 700
Washington, DC 20006

Ms. Kathy T. Puckett
Shell Oil Company
200 N. Dairy Ashford
Houston, TX 77079

Mr. Andrew N. Chau
Shell Energy Services Co. LLC
1221 Lamar, Suite 1000
Houston, TX 77010

Mr. Peter Q. Nyce, Jr.
Department of the Army
JALS-RS Suite 713
901 N. Stuart Street
Arlington, VA 22203-1837

Mr. Milton D. and Joan Stewart
The Small Business High Technology Institute
346 West Georgia Ave.
Phoenix, AZ 85013

Terry Frothun
ARIZONA STATE AFK-CIO
5818 N. 7th Street, Suite 200
Phoenix, AZ 85014-5811

K.R. Saline
K.R. SALINE ASSOCIATES
Consulting Engineers
160 N. Pasadena, Suite 101
Mesa, AZ 85201-6764

Lex Smith
Michael Patten
BROWN & BAIN, PC
2901 N. Central Avenue
Phoenix, AZ 85001-0400

William J. Murphy
CITY OF PHOENIX
200 West Washington Street, Suite 1400
Phoenix, AZ 85003-1611

Chuck Miessner
NEV SOUTHWEST LLC
P.O. Box 711, Mailstop DA308
Tucson, AZ 85702-0711

Jeffrey Walker Martin
NEV SOUTHWEST LLC
1000 Wilshire Boulevard, Suite 500
Los Angeles, CA 9017-2462

Michelle Ahlmer
ARIZONA RETAILERS ASSOCIAT
137 E. University Drive
Mesa, AZ 85201

Dan Neidlinger
NEIDLINGER & ASSOCIATES
3020 N. 17th Drive
Phoenix, AZ 85015

Chuck Garcia
PNM, Law Department
Alvarado Square, MS 0806
Albuquerque, NM 87158

James H. Sanders
KWH METERING
8419 Hanks Place
Tucson, AZ 58704-6549

Sanford J. Asman
570 Vinington Court
Dunwoody, GA 30350-5710

Patricia Cooper
AEPCO/SSWEPCO
1000 South Highway 80
Benson, Arizona 85602

Steve Segal
LEBOEUF, LAMB, GREEN, & MA
633 17th Street, Suite 2000
Denver, CO 80202-3620

Holly E. Chastain
SCHLUMBERGER RESOURCE
MANAGEMENT SERVICES, INC.
5430 Metric Place
Norcross, GA 30092-2550

Leslie Lawner
ENRON CORP
712 North Lea
Roswell, NM 88201

Alan Watts
Southern California Public Power Agency
529 Hilda Court
Anaheim, CA 92806

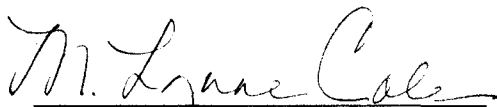
Frederick M. Bloom
Commonwealth Energy Corporation
15991 Red Hill Avenue, Suite 201
Tustin, CA 92780

Margaret McConnell
Maricopa Community Colleges
2411 W. 14th Street
Tempe, AZ 85281-6942

Paul Bullis, Chief Counsel
Legal Division
ARIZONA CORPORATION COMM
1200 West Washington Street
Phoenix, AZ 85007

Director, Utilities Division
ARIZONA CORPORATION COMMISSION
1200 West Washington Street
Phoenix, AZ 85007

ARIZONA REPORTING SERVICE,
2627 N. Third Street, Suite Three
Phoenix, AZ 85004-1104



M. Lynne Cole
Assistant to Jerry R. Bloom

CERTIFICATE OF SERVICE

AN ORIGINAL AND TEN COPIES of the
foregoing filed this 2nd day of July, 1999 with:

Docket Control Division
Arizona Corporation Commission
1200 West Washington
Phoenix, Arizona 85007

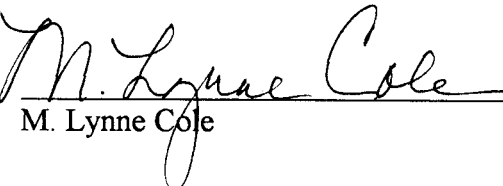
Copies of the foregoing mailed this 2nd day of July, 1999 to:

Jerry Rudibaugh, Chief Hearing Officer
Hearing Division
Arizona Corporation Commission
1200 West Washington
Phoenix, Arizona 85007

Paul Bullis, Chief Counsel
Legal Division
Arizona Corporation Commission
1200 West Washington
Phoenix, Arizona 85007

Ray Williamson, Acting Director
Utilities Division
Arizona Corporation Commission
1200 West Washington
Phoenix, Arizona 85007

Service list for Docket No. RE-00000C-94-0165

By 
M. Lynne Cole